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Local Counsel for Defendant Trans Union, LLC

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON (TACOMA)**

CHARLES ALBERT LAW,
Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES
LLC, a Georgia Limited Liability Company;
EXPERIAN INFORMATION SOLUTIONS,
INC., an Ohio Corporation; and TRANS
UNION LLC, a Delaware Limited Liability
Company;
Defendants.

CASE NO.

**TRANS UNION, LLC'S NOTICE OF
REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Jefferson County Superior Court, State of Washington to the United States District Court for the Western District of Washington, on the following grounds:

1. Plaintiff Charles Albert Law served Trans Union on or about December 9, 2021, with a Summons and Complaint, to be filed in the Jefferson County Superior Court, State of

TRANS UNION, LLC'S NOTICE OF REMOVAL
- 1
Case No.
{13288/116/02716585-2}

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1 Washington. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and
2 **Exhibit B**.

3 2. In the Complaint, Plaintiff makes claims against Trans Union under the Fair Credit
4 Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ I, 2.2, 2.6-2.8, 3.2 and
5 5.1-7.7.

6 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C.
7 § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus
8 supplies this federal question.

9 4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Jefferson
10 County Superior Court, State of Washington to the United States District Court for the Western
11 District of Washington.

12 5. Counsel for Trans Union has contacted counsel and/or corporate representatives for
13 the Defendants Equifax Information Services, LLC (“Equifax”), and Experian Information
14 Solutions, Inc. (“Experian”). Equifax and Experian have consented to this removal as evidenced
15 by the consents attached hereto as **Exhibit C** and **Exhibit D**, respectively.

16 6. Notice of this removal will promptly be filed with the Jefferson County Superior
17 Court, State of Washington if the action is filed and served upon all adverse parties.

18 WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from
19 the Jefferson County Superior Court, State of Washington to this United States District Court,
20 Western District of Washington.

Respectfully submitted,

MONTGOMERY PURDUE PLLC

s/ Benjamin I. VandenBerghe

Benjamin I. VandenBerghe

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Counsel for Defendant Trans Union, LLC

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s/ Christopher M. Reed

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Counsel for Defendant Trans Union, LLC

TRANS UNION, LLC'S NOTICE OF REMOVAL

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **21st day of December, 2021**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **21st day of December, 2021**, properly addressed as follows:

<u>for Plaintiff Charles Albert Law</u> SaraEllen Hutchinson, Esq. Law Office of SaraEllen Hutchinson, PLLC 539 Broadway Tacoma, WA 98402	
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s/ Christopher M. Reed

Christopher M. Reed
 WA State Bar No. 49716

Counsel for Defendant Trans Union, LLC

TRANS UNION, LLC'S NOTICE OF REMOVAL

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